

1 SIDNEY J. COHEN, ESQ., State Bar No. 39023  
2 SIDNEY J. COHEN PROFESSIONAL CORPORATION  
3 427 Grand Avenue  
Oakland, CA 94610  
Telephone: (510) 893-6682

4 Attorneys for Plaintiff  
5 RICHARD SKAFF

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RICHARD SKAFF

CASE NO. C 09-05518 JSW  
Civil Rights

Plaintiff,

V.

10 REAL MEX RESTAURANTS,  
11 INC; GENERAL GROWTH  
12 PROPERTIES, INC. and DOES 1-  
25, Inclusive,

**STIPULATION  
AND [PROPOSED] ORDER  
TO CONTINUE CASE  
MANAGEMENT CONFERENCE**

Defendants.

1 Plaintiff RICHARD SKAFF, by and through his attorney, and defendant  
 2 GENERAL GROWTH PROPERTIES, INC, by and through its attorneys, file this  
 3 "STIPULATION AND [PROPOSED ] ORDER TO CONTINUE CASE  
 4 MANAGEMENT CONFERENCE" presently scheduled for September 21, 2012 and  
 5 to continue the Joint Case Management Statement presently due September 14,  
 6 2012 because plaintiff and defendant GENERAL GROWTH PROPERTIES, INC  
 7 have just reached agreement to settle all aspects of the lawsuit between them and  
 8 because they need approximately thirty (30) days to draft and enter into a formal and  
 9 complete written Settlement Agreement, to enter into a stipulation and order for  
 10 dismissal with prejudice of the remainder of the lawsuit between them, and to obtain  
 11 court Order dismissing with prejudice the remainder of the lawsuit between them.

12 Plaintiff and defendant GENERAL GROWTH PROPERTIES, INC  
 13 previously settled all but a few of the items in the injunctive relief aspect of the  
 14 lawsuit between them. With the exception of these few items, the court dismissed  
 15 the injunctive relief aspect of the lawsuit with prejudice and retained jurisdiction to  
 16 enforce the settlement agreement for injunctive relief between plaintiff and  
 17 defendant GENERAL GROWTH PROPERTIES, INC (See Docket No.33).

18 Plaintiff and defendant GENERAL GROWTH PROPERTIES, INC stipulate  
 19 and agree that on September 10, 2012 Plaintiff and defendant GENERAL  
 20 GROWTH PROPERTIES, INC. reached an agreement to settle the remainder of  
 21 the lawsuit between them, which includes a settlement of the few unresolved  
 22 injunctive relief items between them and a settlement of the damages and attorney's  
 23 fees, litigation expenses, and costs aspects of the lawsuit between them.

24 Plaintiff and defendant GENERAL GROWTH PROPERTIES, INC further  
 25 stipulate and agree that they need up to thirty (30) days to draft and enter into a  
 26 formal, written settlement agreement, to draft and enter into a written Stipulation  
 27 And Order To Dismiss with prejudice the remainder of the lawsuit between them,

1 to file the Stipulation And Order To Dismiss with the court, and to obtain a court  
2 order dismissing with prejudice any and all claims of the lawsuit between them.

3 Consequently, in the interests of judicial economy and maximization of the  
4 judicial resources of the court and counsel, Plaintiff and defendant GENERAL  
5 GROWTH PROPERTIES, INC stipulate and agree to a continuance of the case  
6 management conference from September 21, 2012 to October 26, 2012 and to a  
7 continuance of the presently scheduled joint case management statement from  
8 September 14, 2012 to October 19, 2012 so that they may consummate the  
9 settlement of the lawsuit between them and the dismissal with prejudice of any and  
10 all claims of the lawsuit between them prior to a case management conference.

11 Wherefore, it is so stipulated.

12 Date: September 11, 2012

SIDNEY J. COHEN  
PROFESSIONAL CORPORATION  
/s/ Sidney J. Cohen

---

Sidney J. Cohen  
Attorney for Plaintiff Richard Skaff

15 Date: September 11, 2012

JACKSON LEWIS LLP  
/s/ Cara Ching Senaha

---

Cara Ching-Senaha or Jamerson Allen  
Attorneys for Defendant  
General Growth Properties, Inc.

19 **ORDER**

20 Having considered the aforesaid Stipulation, and for good cause shown, the  
21 case management conference is continued from September 21, 2012 to  
22 October 26, 2012 and the joint case management statement from September 14,  
23 2012 to October 19, 2012.

24 **IT IS SO ORDERED.**

25 Date: September 12, 2012

---



Jeffrey S. White  
United States District Judge